

Exhibit A

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

ELIZABETH SINES, et al.,

Plaintiffs

vs.

Civil Action No.

JASON KESSLER, et al.,

3:17-cv-00072-NKM

Defendants

REMOTE VIDEO-RECORDED DEPOSITION

OF

JEFFREY STEPHEN SCHOEP

JULY 21, 2020

REPORTED BY:

R. Dwayne Harrison

Job No. 181000

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INDEX

Deposition of JEFFREY STEPHEN SCHOEP
July 21st, 2020

Examination by:	Page
Mr. Isaacson	9
Exhibit No.	Marked
Exhibit 1 National Front Website	29
Exhibit 2 Application for National Socialist Movement	29
Exhibit 3 Declaration 11-14-17	31
Exhibit 4 Interview 3-14-16	34
Exhibit 5 Public Release 3-01-19	38
Exhibit 6 Second Public Release	42
Exhibit 7 Schoep VK Profile	43
Exhibit 8 Why You Should Join the National Socialist Movement	53
Exhibit 9 After Action Report May 2017	56
Exhibit 10 After Action Report May 2017	56
Exhibit 11 Nationalist Front Website	60
Exhibit 12 Nationalist Front Website Page	64
Exhibit 13 After Action Report July 2017	68
Exhibit 14 Defendant Responses To Defendant's	

	First Interrogatories and Request for Production of Documents	76
Exhibit 15	Response Regarding Phones and Email Addresses	85
Exhibit 16	Defendant Nationalist Socialist Movement's Responses to Defendant's First interrogatories	89
Exhibit 17	Nationalist Front Answers to Interrogatories	90
Exhibit 18	Parrott Email 9-28-17	91
Exhibit 19	Parrott Email 9-28-17	94
Exhibit 20	NSM Policy Announcement	99
Exhibit 21	Video Clip Number 2	112
Exhibit 22	Kessler Email 7-9-17	117
Exhibit 23	Schoep Tweet 8-2-17	130
Exhibit 24	Schoep Tweet 8-5-17	132
Exhibit 25	Schoep Tweet 8-6-17	133
Exhibit 26	Schoep Tweet 8-7-17	134
Exhibit 27	VK Announcement 8-10-17	134
Exhibit 28	Event Flyer	137
Exhibit 29	Tweet 8-13-17	139
Exhibit 30	DK Announcement 8-13-17	141
Exhibit 31	Schoep Sweet 8-13-17	146
Exhibit 32	NSM Announcement	148

Exhibit 33	After Action Report 8-17-17	152
Exhibit 34	NSM magazine, fall/winter of 2017	200
Exhibit 35	Angelo VK Message	203
Exhibit 36	Schoep Email 1-26-18	207
Exhibit 37	Fighting For Everyone's Right To Say What They Want	208
Exhibit 38	Expressen Interview	208
Exhibit 39	Schoep Email 8-15-17	219
Exhibit 40	Metadata #1443978.1	224
Exhibit 41	NSM's Responses to Plaintiff's Second Set of Interrogatories	263
Exhibit 42	A Brief History of the American National Socialist Movement	266
Exhibit 43	25-point Platform	267

1 JEFFREY STEPHEN SCHOEP

2 P-R-O-C-E-D-I-N-G-S

3 THE VIDEOGRAPHER: Good morning, everyone.

4 My name is Tom Feissner and I am a certified legal
5 video specialist in association with TSG Reporting
6 Incorporated.

7 Due to the severity of the COVID-19 and
8 following the practice of social distancing, I will not
9 be in the same room with the witness. Instead, I will
10 record this videotaped deposition remotely. The
11 reporter, Dwayne Harrison, will also not be in the same
12 room and will swear the witness remotely.

13 Do all parties stipulate to the validity of
14 this video recording and remote swearing and that it
15 will be admissible in the courtroom as if it had been
16 taken following Rule 30 of the Federal Rules of Civil
17 Procedure and the State's rules where this case is
18 pending?

19 MR. ISAACSON: Yes.

20 MR. REBROOK: Yes.

21 THE VIDEOGRAPHER: Very good. Thank you.
22 I will now begin to read.

23 This is the remote video deposition of
24 Jeffrey Stephen Schoep taken in the matter of Elizabeth
25 Sines vs. Jason Kessler et al. in the United States

1 JEFFREY STEPHEN SCHOEP
2 District Court for the Western District of Virginia,
3 case number 3:17-CV-00072-NKM. Today's date is
4 Tuesday, July 21st, 2020. The time on the video
5 monitor is 9:42 a.m. My name is Thomas K. Feissner
6 CLVS and I am the videographer. The court reporter is
7 Dwayne Harrison.

8 We are here today on behalf of TSG
9 Reporting, New York, New York. All parties to this
10 deposition are appearing remotely and have agreed to
11 the witness being sworn in remotely.

12 Due to the nature of remote reporting,
13 please pause briefly before speaking to ensure all
14 parties are heard completely.

15 Counsel will now please introduce
16 themselves beginning with counsel for the Plaintiff.

17 MR. ISAACSON: Bill Isaacson with the law
18 firm of Paul Weiss, the Plaintiffs.

19 MR. BARKAI: Yotam Barkai, Boies Schiller
20 law firm, Plaintiffs.

21 THE VIDEOGRAPHER: Counsel for the
22 Defendant?

23 MR. REBROOK: This is Edward ReBrook. I'm
24 counsel for Mr. Schoep.

25 THE VIDEOGRAPHER: The court reporter will

1 JEFFREY STEPHEN SCHOEP

2 now sworn in the deponent.

3 Whereupon,

4 JEFFREY STEPHEN SCHOEP,

5 called as a witness, having been first duly sworn to

6 tell the truth, the whole truth, and nothing but the

7 truth, was examined and testified as follows:

8 EXAMINATION BY MR. ISAACSON:

9 Q Mr. Schoep, my name is Bill Isaacson. I'll
10 be asking you questions today. if you don't understand
11 a question either because of the way I said it or
12 because of the technology, let me know and I'll be
13 happy to repeat it or rephrase it.

14 Would you state your full name for the
15 record?

16 A Jeffrey Stephen Schoep.

17 Q Where do you currently reside?

18 A Michigan.

19 Q Where in Michigan?

20 A I'm sorry?

21 Q Where in Michigan?

22 A Eastpoint, Michigan.

23 Q Tell me your educational background.

24 A I'm sorry?

25 Q What education have you had educational

1 JEFFREY STEPHEN SCHOEP

2 background?

3 A High school diploma.

4 Q I'm sorry, that crackled. Would you repeat
5 that?

6 A High school diploma.

7 Q Where did you graduate high school?

8 A My diploma was St. Cloud Technical High
9 School.

10 Q That's St. Cloud where?

11 A Minnesota.

12 Q Following high school, would you describe
13 your employment history, the jobs you have had?

14 A All kinds of different jobs. Everything
15 from washing dishes, siding houses and [Inaudible.]

16 Q Are you currently employed?

17 A Not currently.

18 Q What was the last position that you had?

19 A I ran by own business.

20 Q What was that business?

21 A Actually, I should correct that. I'm
22 currently operating a nonprofit, but it's something
23 that's fairly new. So I don't know if that's
24 considered -- counts as employment or not.

25 Q All right. What's the nonprofit that you

1 JEFFREY STEPHEN SCHOEP

2 are currently running?

3 A Beyond Barriers.

4 Q And would you describe what Beyond Barriers
5 is, please?

6 A Beyond Barriers is a counter-extremism
7 organization. One of the things I do is help people
8 walk away from various forms of extremism. I do public
9 speaking. I do consulting, things like that.

10 MR. ISAACSON: How is the court reporter
11 doing?

12 THE REPORTER: I'm having difficulties,
13 obviously. It's still -- maybe people if they could
14 mute their -- I'm just having -- it's just very
15 crackly.

16 MR. BARKAI: Everyone mute themselves if
17 they're not speaking.

18 MR. ISAACSON: Let's see if that makes a
19 difference.

20 BY MR. ISAACSON:

21 Q AND is Beyond Barriers, has that been
22 approved as a nonprofit? Is it a corporation? Explain
23 to me what the status is.

24 A It's a 501(c)(3).

25 Q And has it been approved as a 501(c)(3)?

1 JEFFREY STEPHEN SCHOEP

2 A I believe so, yes.

3 Q And are you the head of Beyond Barriers?

4 A Yes. The founder.

5 THE REPORTER: I'm sorry?

6 A The founder, yes.

7 Q And do you receive a salary from Beyond
8 Barriers?

9 A We haven't gotten that far yet.

10 Q Does that mean you have not received a
11 salary or any compensation yet?

12 A Correct, correct.

13 Q Now before Beyond Barriers, what was your
14 last position of any type?

15 A What was the last?

16 Q Position, whether you were employed or you
17 are working for an organization.

18 A I ran the record label NSM Records.

19 THE REPORTER: One more time.

20 A NSM 88 Records.

21 Q And when did you stop running NSM 88
22 Records?

23 A 2019, sometime in mid 2019. Early 2019. I
24 don't know the exact date.

25 Q Was that a paid position?

1 JEFFREY STEPHEN SCHOEP

2 it was me doing everything.

3 Q And did the record label continue after you
4 left or did it shut down?

5 A It shut down. I left the NSM I believe it
6 was March 2nd or 3rd, somewhere in early March and the
7 store, the record store stayed open for a couple more
8 months, a few more months, something like that, before
9 I shut it down.

10 Q All right. Now, the National Socialist
11 Movement is a nonprofit corporation based in Michigan;
12 is that right?

13 A It's been dissolved, but it was -- it was a
14 nonprofit corporation based in Michigan, yes.

15 Q And you were a member of the organization
16 for some period of years?

17 A 27 years.

18 Q And you had a leadership position with the
19 organization throughout that period; is that correct?

20 A For about 25 years.

21 Q And one title you had was commander; is
22 that right?

23 A Correct.

24 Q Was that for about 25 years?

25 A Correct.

1 JEFFREY STEPHEN SCHOEP

2 Q And another title you had was president; is
3 that right?

4 A It may have been referred to as president
5 on Articles of Incorporation. But within the
6 organization I was typically national director or
7 commander.

8 Q And regardless of whether you were referred
9 to as commander or national director or president, you
10 were in charge of the organization for approximately 25
11 years; is that right?

12 A Correct.

13 Q And you were responsible for the operations
14 and conduct of NSM for 25 years?

15 A I don't know how to answer that question.
16 I was in charge of the corporation or the head of the
17 corporation, yes.

18 Q And you were responsible for what that --
19 what NSM did for approximately 25 years?

20 A That's such a broad -- that's such a broad
21 question. I mean, I don't want to get in something
22 where you say, well, a member did this in 1998 and that
23 was my responsibility, you know.

24 So I don't know how -- if I should answer
25 that or how to answer this question.

1 JEFFREY STEPHEN SCHOEP

2 Q But if it was an action by the
3 organization, ultimately -- you were at the top of that
4 organization, ultimately that was your responsibility?

5 A I made the calls for the organization, yes.

6 Q Was there any --

7 MR. REBROOK: This is Edward ReBrook. I
8 have an objection to the form of the question.

9 Is the suggestion that anything done by an
10 individual in the organization is an act by the
11 organization?

12 MR. ISAACSON: I'll move on to the next
13 question.

14 BY MR. ISAACSON:

15 Q Now, did -- was there any board such as a
16 board of directors or any other supervisory board for
17 NSM during the 25 years that you were the head of the
18 organization?

19 A On Articles of Incorporation, there was
20 president and I believe in the State of Michigan it's
21 three -- two or three other board members.

22 Q And when you left NSM in 2019, who were the
23 two or three other board members?

24 A Hmm, I don't have the papers in front of me
25 and my memory is not the greatest. There was some

1 JEFFREY STEPHEN SCHOEP

2 Q It says in the first question and answer
3 that NSM is America's largest national socialist group.

4 Was that correct at the time?

5 A We believe that to be correct at the time.

6 Q And did you have the chance to review this
7 interview after it came out, this -- as it was printed
8 on the website?

9 A I don't recall either way.

10 Q So you -- you knew you were interviewed,
11 but you don't remember reading it afterwards; is that
12 right?

13 A I remember doing the interview, but I don't
14 recall if I -- if I reread it or read through it or
15 anything like that afterwards. I don't recall. It's
16 possible, but I don't recall.

17 Q One statement attributes to you, in
18 response to question 3, is that "they say communism is
19 dead, but international Jewry has plagued both sides,
20 capitalism and communism, and they are in the thick of
21 the evil that plagues us to this day."

22 Is that a statement you would have made at
23 the time?

24 A I made a lot of statements like that at the
25 time.

1 JEFFREY STEPHEN SCHOEP

2 Q Any other divisions?

3 A Media department. I think that was not
4 really a division, but I think that's all I can think
5 of off the top of my head.

6 Q Was community outreach a division?

7 A That would probably be department rather
8 than a division.

9 Q Did you have departments other than
10 community outreach?

11 A Yeah, there was a public relations, there
12 was a media department. That's all I can think of
13 right off for the time being.

14 Q Now the -- go ahead. I didn't mean to
15 interrupt.

16 A No, I was just saying it's possible there
17 was other departments. I just can't think of it.

18 Q The Nationalist Front was an agreement that
19 certain groups would participate together; is that
20 right?

21 A The Nationalist Front was basically an idea
22 on paper that -- there was a lot of bickering in the
23 white nationalist movement. So the idea of the
24 Nationalist Front was that groups would try to work
25 together for at least in the public -- in the public

1 JEFFREY STEPHEN SCHOEP
2 arena. That's all the Nationalist Front was. There
3 was not an actual organization. It did not have a
4 specific leader or anything like that. It was just
5 basically an agreement that groups would cooperate and
6 add support to each other in the area of -- for
7 example, if one group from the Nationalist Front was
8 doing a rally, members from other groups could support
9 that and not -- you know, without issue.

10 Q The Nationalist Front was an agreement
11 amongst its members to cooperate and add support to one
12 another; is that right?

13 A Well, I mean, I don't know if I like the
14 term member necessarily because there was never any --
15 it was basically just an agreement that groups would
16 work together. So there wasn't, like, you -- a person
17 couldn't join the Nationalist Front like an individual
18 or something like that because it never existed as an
19 actual physical organization. It was more of a paper
20 agreement that groups would cooperate together.

21 Q When I say members, did the Nationalist
22 Front have member organizations?

23 A Yeah, I believe so.

24 Q Was the Nationalist Front --

25 THE REPORTER: Start again, please. Start

1 JEFFREY STEPHEN SCHOEP

2 again, please.

3 Q Was the Nationalist Front an agreement
4 amongst the organizations -- let me start that over.

5 Was the Nationalist Front an agreement
6 amongst member organizations to work together and
7 support one another?

8 A That sounds accurate.

9 Q And was it an agreement that when the
10 organizations -- member organizations conducted
11 political activities, that they would do so in a
12 generally similar way?

13 A That sounds accurate.

14 Q And the members of the Nationalist Front
15 were listed on the website of the Nationalist Front; is
16 that right?

17 A I believe so.

18 MR. ISAACSON: Can we get the website
19 membership handy, Yotam?

20 MR. BARKAI: I'm marking this Exhibit 11.

21 (Schoep Exhibit 11 was marked for purposes
22 of identification.)

23 BY MR. ISAACSON:

24 Q All right. You do recognize this as a page
25 from the Nationalist Front website?

1 JEFFREY STEPHEN SCHOEP

2 A It appears to be.

3 Q And there's a list of the member
4 organizations there, the National Socialist Movement,
5 the Traditionalist Worker Party, the League of the
6 South, White Lives matter, Vanguard America, America
7 First Committee, RNP America, VBS, 28 Social Club and
8 USAS.

9 Do you recognize those as member
10 organizations of the Nationalist Front?

11 A It appears that is what was on the website.

12 Q But separate from the -- what's on the
13 website, you understood those to be member
14 organizations of the Nationalist Front; is that
15 correct?

16 A Some time has passed. I don't even -- a
17 couple of these groups I don't really even -- I
18 couldn't even tell you what the initials stand for on a
19 couple of the last ones. But this does appear to be
20 the list of member organizations.

21 Q So the Nationalist -- you knew the National
22 Socialist Movement was a member organization of the
23 Nationalist Front, correct?

24 A In the context of how I explained it, that
25 it was an agreement between the groups. But the

1 JEFFREY STEPHEN SCHOEP

2 Nationalist Front was never like a registered -- like
3 the NSM was registered, incorporated in the State of
4 Michigan. The Nationalist Front was never incorporated
5 or anything like that. I said it was an idea on paper.

6 Q So with the understanding that the
7 Nationalist Front was an agreement rather than
8 something that was incorporated, the nationalist
9 socialist movement was a member organization of the
10 Nationalist Front; is that correct?

11 A The organizations weren't -- it says member
12 organizations here, but there was nothing -- there was
13 no leader. So it's hard to -- I don't know how to
14 answer this question other than how I've already
15 explained it, that the Nationalist Front was basically
16 just an idea that part of the reason for the formation
17 was is that a lot of the groups in the white
18 nationalist movement bicker amongst each other and the
19 idea behind the Nationalist Front was there was an
20 agreement between groups that they wouldn't behave in
21 that manner anymore and they would work together in the
22 public sphere.

23 Q The National Socialist Movement joined that
24 agreement that you described that was the Nationalist
25 Front; is that correct?

1 JEFFREY STEPHEN SCHOEP

2 A Correct.

3 Q You knew the Traditionalist Worker Party
4 was part of the agreement that was the Nationalist
5 Front?

6 A Yes.

7 Q You knew the League of the South was a
8 member of that agreement that was the nationalist
9 front; is that correct?

10 A Yes.

11 Q Vanguard America was a member of that
12 agreement of the Nationalist Front; is that correct?

13 A Correct.

14 [The court reporter requested a brief
15 recess.]

16 MR. ISAACSON: Mr. Schoep, it's not just
17 you and I that get to take breaks.

18 Do you want to take ten minutes?

19 THE REPORTER: Plenty, plenty.

20 THE VIDEOGRAPHER: We're now going off the
21 video record. The time is 11:07. One moment please.
22 We're off.

23 (A recess was taken.)

24 THE VIDEOGRAPHER: We are now going back on
25 video record. The time is 11:16.

1 JEFFREY STEPHEN SCHOEP

2 BY MR. ISAACSON:

3 Q The Nationalist Front also called itself a
4 voluntary alliant; is that right?

5 A That sounds accurate.

6 Q And one purpose was to pool all the talent,
7 resources and manpower of the member organizations; is
8 that right?

9 A That sounds -- that could be accurate. As
10 I explained, the idea of the Nationalist Front was to
11 get people to cooperate and not to bicker amongst each
12 other.

13 Q And it was open to organizations that had a
14 proven commitment to struggle for the white nationalist
15 vision; is that right?

16 A I really don't -- is that -- I don't know
17 if that's the statement that was on the site or what.

18 Q Why don't we look at what's been previously
19 marked as Exhibit 80?

20 MR. BARKAI: I'm marking this as
21 Exhibit 12.

22 (Schoep Exhibit 12 was marked for purposes
23 of identification.)

24 BY MR. ISAACSON:

25 Q This will be Exhibit 12 to the Schoep

1 JEFFREY STEPHEN SCHOEP

2 deposition.

3 Do you recognize this as a page from

4 Nationalist Front website, Mr. Schoep?

5 A It looks familiar.

6 Q It says: "The Nationalist Front is a
7 voluntary alliance that movement leaders are encouraged
8 to join in order to pool your talent resources in
9 manpower with several other national, regional and
10 local organizations."

11 That was a correct statement at the time it
12 was made?

13 A Yes. It says that and it also says that
14 the Nationalist Front is not an organization in itself,
15 but it's an alliance of organizations. That's the best
16 way I can explain it as well.

17 Q It's not -- it's not a corporation, it's
18 not a registered organization, it's an alliance for a
19 group?

20 A Yeah. That's all it was, was an agreement
21 for an alliance, yes.

22 Q It had members. It refers to memberships,
23 right?

24 A I see that term used on the site. But
25 again, it's sort of a loose term. So it's like that's

1 JEFFREY STEPHEN SCHOEP

2 a member organization. I don't want to get tripped up
3 over wording, but that's -- as I explained, it was just
4 basically an agreement between groups to work together
5 just as it says here on this page.

6 Q And you were only allowed to be a member to
7 the agreement if you were an organization with a proven
8 commitment to struggle for the white nationalist
9 vision; is that right?

10 A That sounds -- is that what it says in the
11 first paragraph there?

12 Q Second paragraph.

13 A Second paragraph? That would be accurate
14 if that's -- apparently this is from the website, so...

15 Q And you were involved in helping to
16 organize the agreement or alliance that we're calling
17 the Nationalist Front; is that right?

18 A Yes.

19 Q And who did you work with to form the
20 organization?

21 I'm sorry, who did you work with to form
22 the alliance?

23 A Well, the groups that are -- that are
24 listed on there.

25 Q And you were trying to put together an

1 JEFFREY STEPHEN SCHOEP

2 umbrella group of many organizations that would all
3 work together?

4 A That was the whole -- the whole concept of
5 the Nationalist Front.

6 Q And then the website for the Nationalist
7 Front was owned by the Traditionalist Worker Party; is
8 that right?

9 A Correct.

10 Q And the Traditionalist Worker Party gave
11 permission to the Nationalist Front to use the website
12 and was a member of the agreement; is that right?

13 A That sounds accurate.

14 Q And you were involved in ongoing work to
15 assist in having the member organizations of the
16 Nationalist Front work together; is that right?

17 A I guess I'm really not understanding that
18 question.

19 Q So you help start the organization, but
20 then you continued to work with the organization; isn't
21 that right?

22 A Again, you know, calling it an organization
23 is -- is sort of semantics or -- or...

24 Q Let me rephrase the question then.

25 You helped form the alliance and then you

1 JEFFREY STEPHEN SCHOEP

2 continued to work with the alliance after it was
3 formed; is that right?

4 A Well, yeah, I suppose. The organizations
5 participated in different things together and rallies
6 and events and things of that nature which was the
7 whole idea behind it, yes.

8 Q The alliance participated together in
9 rallies and did it also have meetings?

10 A There may have been one or two meetings,
11 but particularly it was mainly for, like, the street
12 activism type of stuff rallies or protests, things like
13 that.

14 Q So the Nationalist Front worked together
15 for street activities?

16 A Demonstrations, protest rallies.

17 Q The -- if we could look at JS350.

18 MR. BARKAI: We'll mark this as Exhibit 13.

19 (Schoep Exhibit 13 was marked for purposes
20 of identification.)

21 BY MR. ISAACSON:

22 Q Do you recognize this as an after action
23 report from July 2017 from the NSM?

24 A That appears to be what it is.
25 Q And, typically, you would have reviewed and

1 JEFFREY STEPHEN SCHOEP

2 MR. BARKAI: Exhibit 29.

3 (Schoep Exhibit 29 was marked for purposes
4 of identification.)

5 BY MR. ISAACSON :

6 Q All right. This was a tweet you sent out
7 on August 13th, correct?

8 A That's what the date is on it, correct.

9 Q And you say it's a standard -- "it was an
10 honor to stand with you all in Charlottesville this
11 weekend" and then you refer to NSM.

12 That's the National Socialist Movement,
13 right?

14 A Correct.

15 Q Then you refer to -- then it says NF, the
16 National -- Nationalist Front, correct?

17 A Correct.

18 Q Then TWP. That's the Traditionalist
19 Workers Party; is that correct?

20 A Correct.

21 Q LOS, that's League of the South?

22 A Correct.

23 Q VA, that's Vanguard America?

24 A Yup.

25 Q You have to help me out with ECK.

1 JEFFREY STEPHEN SCHOEP

2 A I don't recall what this is.

3 Q What about CHS?

4 A I don't recall what that is either.

5 Q Okay. And you're saying it was an honor to
6 stand together with all of those groups in
7 Charlottesville, correct?

8 A That's what I said at the time, correct.

9 Q And refer to them all as true warriors,
10 correct?

11 A That's what it says, correct.

12 Q So by August 13, you knew that you had
13 stood together at Unite the Right with the Nationalist
14 Front organization members, correct?

15 A Yes.

16 Q You knew you had stood together with
17 members of the Traditional Workers Party, correct?

18 A Correct.

19 Q You knew you had stood together with
20 members of the League of the South, correct?

21 A Correct.

22 Q You knew you had stood together with
23 members of Vanguard America?

24 A Correct.

25 Q If we can now do -- the next one, it's got

1 JEFFREY STEPHEN SCHOEP

2 the Breitbart link embedded into it, but doesn't have
3 a -- I don't know that mine has a date. Oh, here we
4 are, ECK.

5 You remember now that ECK would be East
6 Coast Knights, right?

7 A Okay. Yeah, that's correct.

8 Q CHS is Confederate Hammerskins?

9 A Okay.

10 MR. ISAACSON: If we can mark this next one
11 as 30.

12 (Schoep Exhibit 30 was marked for purposes
13 of identification.)

14 BY MR. ISAACSON :

15 Q This is another DK announcement that you
16 issued on or after August 13th that included an article
17 about Charlottesville; is that correct?

18 A That's correct.

19 Q And you say NSM and myself were there
20 referring to Charlottesville, correct?

21 A Correct.

22 Q You battled your way through the streets
23 along with your allies; is that correct?

24 A Correct.

25 Q And you battled your way through the

1 JEFFREY STEPHEN SCHOEP

2 streets with those allies that included the Nationalist

3 Front, correct?

4 A The Nationalist Front. Again, as I

5 explained repeatedly, was a paper agreement between

6 various groups that we would cooperate together for

7 events.

8 Q And you announced that you battled your way

9 through the streets of Charlottesville along with your

10 allies in the Nationalist Front, correct?

11 A Correct.

12 Q And you battled your way through the

13 streets along with your allies in the Traditionalist

14 Workers Party?

15 A Correct, this is what the post says.

16 Q And you also said in your post that you

17 battled your way through the streets along with your

18 allies in the League of the South, correct?

19 A It states batted our way through in one
20 sentence and then the rest are all named afterwards.

21 You're focusing on this battle, but it was a battle for
22 those of us that were there. I mean, we were viciously
23 and violently attacked, so...

24 Q And the other groups you refer to, they
25 were fighting alongside of you, correct?

1 JEFFREY STEPHEN SCHOEP

2 A I mean, I can't speak for these other
3 organizations on what they are doing. All I know is
4 that there was -- it was a terrible day and there was a
5 lot of violence and stuff flying through the air and I
6 was mainly focused on not getting hit with a brick or
7 rock and fists and everybody around me was covered in
8 urine from balloons and things that were thrown and so
9 I wasn't really paying attention to -- if somebody was
10 ten people behind me or in front of me, I didn't pay
11 attention because I was watching stuff flying at my own
12 face.

13 Q You say you were -- you say it was a
14 terrible day and that you were subjected to a lot
15 violence.

16 In your announcement you said it was a
17 glorious day for white solidarity, right?

18 A Yeah, I did say that.

19 Q And you mentioned fighting alongside and
20 battling together.

21 Are there any reports where you describe
22 being subjected to any violence that day?

23 A What do you mean by report?

24 Q VK announced anything about violence that
25 you were subjected to?

1 JEFFREY STEPHEN SCHOEP

2 Charlottesville?

3 A No, we weren't -- I wasn't -- I didn't have
4 anything to do with the organizing of Charlottesville.
5 So I wouldn't have had any contact with authorities or
6 anything like that on the ground.

7 Q The -- I understand that you are now part
8 of a different organization. But at the time you were
9 with NSM, what did you consider to be the goals of the
10 white supremacist movement?

11 A In what context or -- that's a really broad
12 question.

13 Q Well, give me your broad answer then.
14 We'll see if we can narrow it down.

15 A What is the -- what were the goals of the
16 NSM? Is that the question?

17 Q Sure, let's start there.

18 A Well, I believe the political platform for
19 that is on their website and all of that. But,
20 basically, the idea of the organization was creation
21 of, like, a white ethnostate or organization billed
22 itself as a -- in more -- in more recent years, in the
23 last few years that I was with the group, it was being
24 billed as, like, a white civil rights organization, but
25 it's explicitly national socialist or Nazi. So I guess

1 JEFFREY STEPHEN SCHOEP

2 that's kind of the short summary of it.

3 Q Did you view that as to be one of the goals
4 of the Unite the Right rally in Charlottesville, to
5 achieve progress towards a white ethnostate?

6 A I don't think that was really the goal of
7 Charlottesville. It seemed to be more of -- it was
8 being billed as something to unite -- unite the various
9 fractions of the far right and my understanding of it
10 was the rally itself was over the confederate
11 statutes -- the confederate statue there.

12 Q Who did you consider to be the leaders of
13 Unite the Right rally?

14 A Well, I knew -- from what I knew, Kessler,
15 Jason Kessler, had the permit for the rally. He was
16 not -- as far as I knew, wasn't a known leader or
17 anything like that before that, but he was the permit
18 holder and the person that was doing the footwork on
19 the ground.

20 I saw it as -- my impression was that it
21 was more of, like, an alt-right -- an alt-right thing
22 and the groups on -- the groups, what is often referred
23 to as, like, the hard right where the National
24 Socialist Movement and some of the groups that we
25 worked with didn't particularly work with the alt-right